

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

VICTOR SMITH,

Plaintiff,

V.

CASE NO: 3:05 CV 1186

**EURO-PRO OPERATING, L.L.C.,
EURO-PRO MANAGEMENT COMPANY
CORP. and STANRO-EP CORP.,**

Defendants.

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P.26(f), a meeting of the parties' representatives was held on January 30, 2006, by phone, and was attended by:

John I. Cottle, III, for Plaintiff, Victor Smith

Warren B. Lightfoot, Jr., for Defendant, Euro-Pro Management Services, Inc.

2. Pre-Discovery Disclosures. The parties will exchange by February 21, 2006, the information required by Fed.R.Civ.P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery to be completed by January 12, 2007.

Maximum of 30 interrogatories by each party to any other party. Responses due 30 days after service.

Maximum of 30 requests for admission by each party to any other party. Responses due 30 days after service.

Maximum of 30 Requests for Production by each party. Responses due 30 days after service.

Maximum of 7 depositions by Plaintiff and 7 depositions by Defendant.
Each deposition is limited to a maximum of 7 hours each unless extended by agreement of the parties.

Reports of retained experts under Rule 26(a)(2) due:

From Plaintiff by June 16, 2006

From Defendant by July 14, 2006

Supplementations under Rule 26(e) due on or before November 3, 2006.

4. Other Items.

The parties do not request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference in early March, 2007.

Plaintiff should be allowed until April 7, 2006, to join additional parties and amend the pleadings.

Defendant should be allowed until May 5, 2006, to join additional parties and amend the pleadings.

Dispositive motions should be filed by December 1, 2006.

Settlement cannot be evaluated prior to close of discovery.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be filed 15 days prior to trial.

The parties have 7 days after service of final lists of witnesses and exhibits to file objections under Rule 26(a)(3).

The parties believe the case should be ready for trial by April 2, 2007, and estimate a 2-4 day trial at this time.

Dated: February 3, 2006

/s/ John I. Cottle, III

John I. Cottle, III
Attorney for the Plaintiff
Victor Smith

OF COUNSEL:
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/s/ Warren B. Lightfoot, Jr.

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